

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION

No. MD-15-02641-PHX-DGC

This Document Relates to:

Mitchell Blankumsee
Case No.: 2:17-cv-01953-DGC

MOTION TO VOLUNTARILY DISMISS WITHOUT PREJUDICE

A. Layne Stackhouse, attorney for Petitioner in this case, hereby moves this Court pursuant to FRCP 41(2) to voluntarily dismiss this action without prejudice. In support of this Motion, please see DN 13382, 13382-1 and this Court's order, DN 13482.

Plaintiff's counsel respectfully requests that this Court grant this Motion as Petitioner has passed away (see DN 13487 for the Suggestion of Death) and Plaintiff's counsel's impression is that the next of kin does not want to continue with this case.

Dated: November 30, 2018.

SHRADER & ASSOCIATES, L.L.P.

By: /s/ A. Layne Stackhouse

A. Layne Stackhouse
3900 Essex Lane, Suite 390
Houston, TX 77027
T: (713) 782-0000
F: (713) 571-9605
layne@shraderlaw.com

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of November, 2018, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/A. Layne Stackhouse